

EXHIBIT M

From: [Kevin Lavelle](#)
To: ["Campbell, Scott"](#)
Cc: [Loseman, Monica K.](#); [Dan Drosman](#); [Rachel Jensen](#); [Jeremy Daniels](#); [Cox, Trey](#); [Costa, Gregg J.](#); [Turquet Bravard, John L.](#); [Marshall, Lloyd Steven](#); [Megan Rossi](#); ["Greene, Douglas W."](#); [Heather Geiger](#)
Subject: RE: Cassava - complaint supplement
Date: Friday, October 25, 2024 1:51:22 PM

Scott, we understand that Defendants' only objections to the supplemental allegations are (1) that the deadline to amend the pleadings has passed; and (2) that Defendants would be prejudiced if the supplemental allegations extended the class period, because class certification briefing would need to be re-opened.

Based on Defendants' stated grounds for their opposition, we do not believe, for the reasons previously provided, that there is any need to amend the class period or re-open class certification briefing. Accordingly, we believe the issue is now ripe for Court resolution.

-Kevin

From: Campbell, Scott <SCampbell@gibsondunn.com>
Sent: Wednesday, October 23, 2024 6:45 PM
To: Kevin Lavelle <KLavelle@rgrdlaw.com>
Cc: Loseman, Monica K. <MLoseman@gibsondunn.com>; Dan Drosman <DanD@rgrdlaw.com>; Rachel Jensen <RachelJ@rgrdlaw.com>; Jeremy Daniels <JDaniels@rgrdlaw.com>; Cox, Trey <TCox@gibsondunn.com>; Costa, Gregg J. <GCosta@gibsondunn.com>; Turquet Bravard, John L. <JTurquetBravard@gibsondunn.com>; Marshall, Lloyd Steven <LMarshall@gibsondunn.com>; Megan Rossi <MRossi@rgrdlaw.com>; 'Greene, Douglas W.' <dgreene@bakerlaw.com>; Heather Geiger <HGeiger@rgrdlaw.com>
Subject: RE: Cassava - complaint supplement

EXTERNAL SENDER
Kevin,

We have reviewed your proposed supplements to the Second Supplemented Complaint. As you know, the deadline for amending the pleadings has long passed. And as we have previously discussed, among other things, we have significant concerns about adding corrective disclosures to your case after briefing on class certification is completed.

To prevent prejudice to Cassava, we can agree not to oppose your motion to supplement if you agree to supplemental class certification briefing addressing the supplemental allegations. Absent such briefing, we oppose.

Best,
Scott

Scott Campbell
[Of Counsel](#)

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1801 California Street Suite 4200, Denver, CO 80202-2642

From: Kevin Lavelle <KLavelle@rgrdlaw.com>

Sent: Friday, October 18, 2024 11:32 PM

To: Campbell, Scott <SCampbell@gibsondunn.com>

Cc: Loseman, Monica K. <MLoseman@gibsondunn.com>; Dan Drosman <DanD@rgrdlaw.com>; Rachel Jensen <RachelJ@rgrdlaw.com>; Jeremy Daniels <JDaniels@rgrdlaw.com>; Cox, Trey <TCox@gibsondunn.com>; Costa, Gregg J. <GCosta@gibsondunn.com>; Turquet Bravard, John L. <JTurquetBravard@gibsondunn.com>; Marshall, Lloyd Steven <LMarshall@gibsondunn.com>; Megan Rossi <MRossi@rgrdlaw.com>; 'Greene, Douglas W.' <dgreene@bakerlaw.com>; Heather Geiger <HGeiger@rgrdlaw.com>

Subject: RE: Cassava - complaint supplement

Scott,

Please find attached an updated version of Plaintiffs' proposed second supplement to the complaint, based on the revelations concerning Cassava that occurred this summer between June 28 and September 26, 2024. If Defendants oppose supplementing the complaint with these allegations, please let us know on what grounds by October 23, so that we may meet and confer. Plaintiffs reserve the right to further amend or add to the allegations.

-Kevin

From: Kevin Lavelle

Sent: Friday, July 19, 2024 5:57 PM

To: 'Campbell, Scott' <SCampbell@gibsondunn.com>

Cc: 'Loseman, Monica K.' <MLoseman@gibsondunn.com>; Dan Drosman <DanD@rgrdlaw.com>; Rachel Jensen <RachelJ@rgrdlaw.com>; Jeremy Daniels <JDaniels@rgrdlaw.com>; 'Cox, Trey' <TCox@gibsondunn.com>; 'Costa, Gregg J.' <GCosta@gibsondunn.com>; 'Turquet Bravard, John L.' <JTurquetBravard@gibsondunn.com>; 'Marshall, Lloyd Steven' <LMarshall@gibsondunn.com>; Megan Rossi <MRossi@rgrdlaw.com>

Subject: Cassava - complaint supplement

Scott,

We are intending on seeking a second supplement to the complaint given the new revelations regarding Dr. Wang and Cassava on June 28, July 1 and July 17, 2024. As new information appears to be coming out every other week, we are still contemplating the timing of our supplement, however, we wanted to raise the issue for you now. Accordingly, while reserving the right to amend or add to these allegations, please find attached a redline draft of a second supplement to the operative complaint. If Defendants would oppose supplementing the complaint with these allegations, please let us know on what grounds, so that we may meet and confer.

-Kevin

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